

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
ROBERT FIREMAN and ANN RAIDER,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 05-11740MLW
	)	
NEWS AMERICA MARKETING IN-STORE,	)	
INC.,	)	
	)	
Defendant.	)	
_____	)	

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1**

Pursuant to Local Rule 16.1, plaintiffs Robert Fireman and Ann Raider and defendant News America Marketing In-Store, Inc., through their undersigned counsel, hereby respectfully submit the following Joint Statement.

**a. Joint Discovery Plan**

The parties have agreed to the following discovery schedule:

Deadline for serving Initial Disclosures:	6/15/06
Deadline for Amending Pleadings:	8/31/06
Deadline for Fact Discovery:	2/28/07
Deadline for Plaintiff's Expert Designation:	3/30/07
Deadline for Defendant's Expert Designation:	4/27/07
Deadline for Completion of Expert Depositions:	5/31/07

b. Motion Schedule

The parties have agreed to file motions for summary judgment or partial summary judgment on or before July 16, 2007.

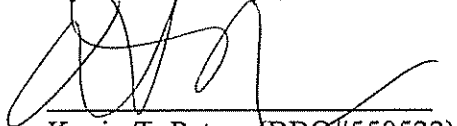
c. Certification of Counsel and Authorized Representative

See Attached

Respectfully submitted,

ROBERT FIREMAN and  
ANN RAIDER

By their attorneys,



Kevin T. Peters (BBO #550522)  
David H. Rich (BBO #634275)  
Todd & Weld LLP  
28 State Street  
Boston, MA 02109  
(617) 720-2626

NEWS AMERICA MARKETING IN-  
STORE, INC.

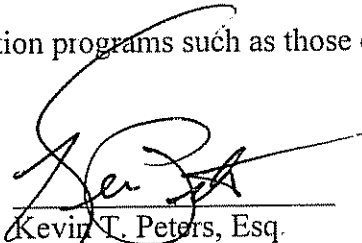
By its attorneys,



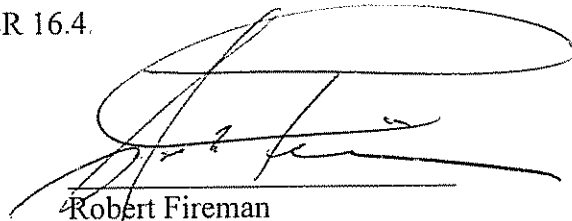
Gordon Katz (BBO # 261080)  
Holland & Knight  
10 St. James Street, 11<sup>th</sup> Floor  
Boston, MA 02116  
(617) 523-2700

**CERTIFICATION IN COMPLIANCE WITH LOCAL RULE 16.1**

The undersigned affirm that they have discussed between and among one and other that they have conferred with a view toward establishing a budget for the costs of conducting full course – and various alternative courses – of litigation; and further affirm that they have conferred regarding the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in LR 16.4.



Kevin T. Peters, Esq.  
Todd & Weld LLP  
28 State Street, 31<sup>ST</sup> Floor  
Boston, MA 02109



Robert Fireman

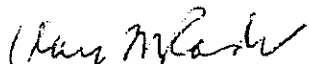
\_\_\_\_\_  
Ann Raider

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\_\_\_\_\_  
Kevin T. Peters, Esq.  
Todd & Weld LLP  
28 State Street, 31<sup>ST</sup> Floor  
Boston, MA 02109

\_\_\_\_\_  
Robert Fireman

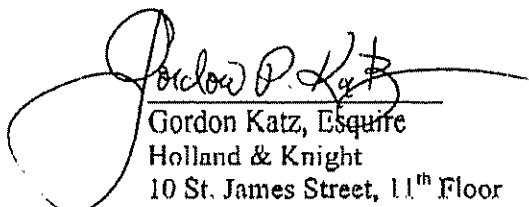
  
\_\_\_\_\_  
Ann Raider

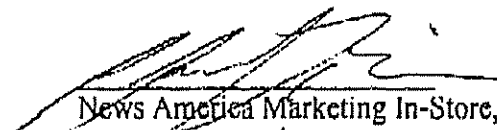
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To:Holland Knight LLP P.2/2

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Gordon Katz, Esquire  
Holland & Knight  
10 St. James Street, 11<sup>th</sup> Floor  
Boston, MA 02116

  
News America Marketing In-Store, Inc.  
By: Jordan Lipman  
Associate General Counsel